

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Crescent Naima Parker,

Debtor.

Case No. 23-10488-PMM
Chapter 13

Motion to Modify Plan After Confirmation

Debtor Crescent Naima Parker, through her attorney, moves this Court as follows:

1. The Plan was confirmed on September 26, 2023.
2. The Debtor wishes to amend the plan to include post-petition mortgage payments consistent with the Court's order filed at ECF No. 55.
3. The Debtor will file a supplemental Schedule J to demonstrate feasibility of the new plan.
4. The Debtor therefore requests approval of the Third Amended Plan filed at ECF No. 57.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: July 26, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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